

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

ANDREW L. COLBORN,

Plaintiff,

vs.

Civil No.: 19-CV-484

NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS LLC; LAURA
RICCIARDI; AND MOIRA DEMOS,

Defendants.

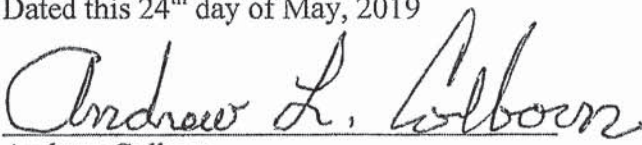
DECLARATION OF ANDREW COLBORN

I, Andrew Colborn, being first duly sworn under oath, declare as follows:

1. I am over 18 years old and have personal knowledge regarding the facts set forth in this Affidavit. If called to testify, I could and would testify competently regarding the facts recited herein.
2. I am the plaintiff in the above captioned case.
3. In January of 2016, approximately one month after the release of the Netflix documentary "Making a Murderer" I retained attorney Jerilyn Dietz of Manitowoc, Wisconsin to explore the possibility of filing a defamation claim against the defendants on my behalf.

4. I provided extensive documentation, at times on a weekly basis, to attorney Dietz during the ensuing months as she continued exploring my potential claim.
5. In April of 2018, attorney Dietz advised me she could no longer represent me as she had been elected to serve as a Manitowoc County Circuit Court Judge.
6. In October of 2018, after pre-release publicity made it clear that "Making a Murderer: Part 2" would renew and add to the original documentary's false claim that I planted evidence in the Halbach murder investigation, I asked attorney Michael Griesbach if he would look into my case.
7. In November of 2018, Griesbach advised me that his review of the law and the facts suggested that I had a convincing claim, at which time I retained him and he began work on drafting a complaint.
8. Griesbach filed the original summons and complaint in this action on December 17, 2018, prior to the expiration of the statute of limitations.
9. Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 24th day of May, 2019


Andrew Colborn

Subscribed and sworn to before me on May 24, 2019


Attorney Michael C Griesbach